

Draft Comment Analysis for Naknek Public Meeting
JRS 10-3-12

Comment categories

SUBS - Subsistence use or way of life

CULT - Effect on culture

TEK - Methodology or need of collecting traditional knowledge

ECON - Economic impacts or considerations

WILD - Effects on wildlife or fish resources

CUMU - Cumulative effects, risks or environmental impacts

404C - Requests EPA use of authority

ADD - Suggestions to improve or add information to the assessment

Table of substantive identified comments

Key to page number rather than the individual making the comment?

#	Subject	Comment	Page
1	CULT	Our traditional knowledge is in total agreement with what many have expressed regarding your findings. BBNC board has always had a salmon first policy. One finding that the salmon are the fundamental foundation of our cultures supports this 100%.	
2	404C	We have three basic things that we need after this assessment is done and we can get to a 404(c) action. First, the tailings should not be deposited into salmon streams. Second toxic materials should not be allowed in salmon streams and I mean no mixing zones. Third, perpetual remediation should not be allowed ever in BB. These mining companies go bankrupt. When they are done they leave the country and it is up to the taxpayers to foot the bill forever and ever. We can't have that here. Please help us ensure that the greatest sockeye salmon run in the world is preserved for future generations	
3	CUMU	I'd like to say that in terms of the diversity of the habitat and the complexity involved and the genetic makeup of the salmon species and how interrelated and interdependent they are on each other, in terms of if you go and do damage to one of the six river systems, you may be doing damage to all six of the river systems. I think that the document will help us understand the cumulative impacts.	
4	CULT	BBNC, along with BBNA and the 31 villages have passed supporting resolutions asking EPA to take action on 404(c) to protect our waters. On behalf of my cultural background, generations of subsistence use, I urge you take care of our people and our cultural ways of life. We have invited you, we have asked you to come, our region has asked because you are the only people and the only agency that may be able to help us with this. We do not need to trade this resource for a resource that is nonrenewable and will only enrich foreign mining companies.	

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5	SUBS	The three quarters of the economy that sustain us is the subsistence way of life. We are also teaching what we are taught to our children to carry on or pass on what we have learned from our parents and grandparents. When to hunt and fish. When not to hunt and fish. What to expect from season to season. How to survive in different seasons. Our cultural people have taught us very well since we are from the western most part of Bristol Bay, it does not mean that we will not be greatly affected. We have always traded for shared with other villages.	
6	CUMU	I think more enlightenment about the Pebble project will only help smooth the waters for better understanding of what our loss in that salmon area could be. Not just that area, but the ripple effect that in so many ways. I encourage people to take more of an interest and also express more concern about the environment. Many many times over the past few years, I have asked people why you support the Pebble project. The first thing I hear is "well, it will provide jobs," which is true. However, I don't hear enough about concern for the environment and long term effects, or no concern for the environment and this is very very troubling. I want to remind people that EPA is doing what they should do, what they were requested to do, and I can't thank them enough for that.	
7	WILD	My main concern about the development up there is the spawning grounds. Whenever you touch the spawning grounds, whether it is in the lower 48 or wherever, the salmon got less and less. Why do you suppose that Bristol Bay has the last great wild salmon in the world? We have five river systems and each one of them requires large spawning grounds. Also the caribou and the moose.	
8	SUBS	Yet, it is unbelievable that the largest proposed mine is going to attempt to build this huge mine that has the lowest grade ore that possibly will create serious problems for us in the future. We have depended on the food source. The area that is located for the site itself is right smack in the middle of salmon producing habitat. It takes care of the salmon and the cycles of salmon that we depend on as subsistence users, commercially, cultural dependency on this covers this who BB area with the 37 villages that exist here.	
9	WILD	Your agency with authority and responsibility to protect BB now you have the science to prove it. The development of the Pebble prospect would have unacceptable adverse impacts on the BB fisheries and wildlife.	
10	CULT	I totally oppose the Pebble Mine because I have been involved with fishing for 51 years myself. My grandfather started in the 1800's and I have my children, grandchildren and great grandchildren involved in fishing today. Fishing has been very important to me and also subsistence fishing. I lost my first husband when I have five little children. If it wasn't for commercial fishing and subsistence fishing I would have had a very hard time. I am very proud to say that I can stand here tonight and say that I have never drawn a welfare check. I would do anything to try and keep our waters clean, because I feel this is a very touchy situation.	

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11	CULT	Fishing is our life and our livelihood. It's what we do for healthy communities, healthy lifestyles. Going out and catching the subsistence fish, smoking these. Passing the traditional cultural knowledge on to the younger generations. You hear about how they will make you free, the fish. We have been doing this for 6,000 years and we will want to do it for 6000 more. The short life of a sulfide mine that lasts 50-70 years and maybe a little longer 75 years, but one that activity is done the mine is just going to sit there with all of the chemicals and continue to kill off more of the rivers and streams, and then instead of just 24% of the Nushagak and the Kvichak river contaminated it is going to be 100% and that is going to be death of 37 communities in BB.	
12	CULT	The generations that are coming who can be fed from this resource and this land and it's a beautiful interaction and it's one that we are losing around the world. When we realize that we have lost it we strive to get it back, but it is taking a long time for this beautiful balance between human, animal and subsistence lifestyle to come about and evolve.	
13	CUMU	Elsewhere around the world, hundreds of millions of dollars are being spent to restore habitat that has been destroyed. Here it is ours to protect, not destroy.	
14	ECON	We have a long history of economic development projects in the region including docks like you see here in Naknek. They play a pivotal role in transportation of goods and services and the like. We support good business and jobs. The entire commercial fisherman who are joining us today, as well as tourism business. We also support conservation easements. We purchased easements that are strategic to salmon habitat. WE also listen to our shareholders including 81% that oppose this project.	
15	ECON	For the last couple of years I've been doing a study with the BB Times local newspaper. The employment ads. Every day there are 30-50 jobs, some of them starting at \$39,000 dollars. Many of the affected areas like Pebble they can't find people for these jobs. Who are these jobs for? Everyone who is willing to work is working. My main concern, if Pebble is allowed to their baseline research and is doing test drilling, because of the impact of studies like that on natural resources and the environment.	
16	WILD	...even if Pebble could safely build the mine, they would have to build 89 miles of roads over salmon habitat and through them. This is scary to me, because as we are all aware, when manmade structures are built, the wildlife around them suffers. Please use the 404(c) to protect the wildlife.	

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17	ADD	I am opposed to any large scale industrial development in the Iliamna Lake watershed due to the impacts that are certain to follow on the waters, fish and the wildlife of the drainage; both by the development itself and the associated infrastructure. Particularly roads, landfills, sewage and chemical disposal systems, water reservations, holding ponds, tailing storage etc. Numerous stream crossings of the 70 or so streams that you identified are very problematic. A couple of those streams, one of them in Knutson River and the other one is Canyon Creek, routinely change their channel. Any kind of structure put across them that carries a slurry or anything else is very likely to be washed out periodically and heavy equipment will have to be in there mucking up the stream as well as replacing whatever was there to begin with.	
18	ECON	We are currently seeing a slow rebound in fish prices. Quality improvement due to handling and refrigeration are improving the marketability of our fish. The marketing is augmented by the fact that our salmon are wild, renewable and pristine. The waters where they regenerate is clear, clean and pristine. The Pebble project, if permitted, represents a huge threat to the rearing waters of two of the largest fish producing drainages left on earth. If sulfuric acid and copper leachate dissolve in surface and ground water, along with other pollutants, are more than likely going to make their way through the earthen dam constructed to hold them back. Ad infinitum is a long time. It won't matter if the salmon get confused as to where their natal stream is. The pollution may not kill the salmon outright. As a matter of fact the salmon may return every year, somewhere. But the perception that these salmon are tainted food sources is all that it will take to drive prices down to a point where the industry will not survive. 15,000 jobs and hundreds of millions of dollars annually are at stake.	
19	SUBS	The seasonal industry offers a way for hunters and gathers and commercial fishers to bring salmon to homes, schools and tables around the globe. This is subsistence life in the global level.	
20	SUBS	The subsistence ways of hunting, berry picking and trapping get underway to prepare for the long days of winter. This is survival. The Yup'iks of SW Alaska do not have alternatives of buying and raising livestock as a way to survive.	
21	404C	This risk is too great for us to accept for our culture and our long term sustainable food source. I ask EPA to quickly take 404c action to protect our salmon and our way of life as well as our land and the future of generations to come.	
22	CULT	Native Alaskan people have believed in the seven generation scenario as our ancestors have always gingerly taken care of the land to assure that we today can enjoy what they had then. We must take care to ensure that our descendants will have seven generations from now.	
23	CUMU	Pebble will become the hole in the bagel if the permitting of the Pebble site becomes a reality. The land around us would be staked for potential development and other companies will be approved as well.	

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24		The assessment is appropriately focused only on large scale mining development. Thank you for not focusing on other infrastructure development that is critical to the regions survival. The assessment is not about roads, the assessment is not about runways and airports. The assessment is not about small property owners.	
25	ADD	I encourage EPA to add layers to the assessment and look at underlying and indirect impacts that mines would cause to BB families and communities. The socioeconomic impacts to individuals and families, the cultural loss of communities and the additional community needs that large mines would bring.	
26	ECON	I believe the economic impacts can be vastly greater than is portrayed in the report. I read from ocean news and technology from May 2012, the worldwide demand for seafood is expected to more than double in the next 10-15 years. However the amount of seafood being harvested from our oceans is expected to decline due to overfishing. I suggest that in ten years, the value of this fishery could be 600 million and could be potentially \$900 million.	
27	CUMU	...mining impacts and disasters are vastly underreported in the mining industry.	
28	CUMU	In nearly every place I have worked, salmon populations have been pushed to if not past the brink of extinction. That is until I finally faced the fish of Bristol Bay five years ago.	
29	ADD	Most of the information in the assessment is based on the low resolution national wetlands inventory data, and vastly underestimates the area impacted by mining in a landscape where I personally sank into the saturated tundra up to my thighs more times than I wish to recall. Given their importance to fish and wildlife, more effort is essential to accurately estimate the wetland area in the region.	
30	AK	The State of AK is acting like a development partner of Pebble. Whether it is temporary water use permits, dumping directly of drilling material into the groundwater, artesian slime running down the hill.	
31	CUMU	Your watershed assessment, one area I think can be stronger is that you underestimate the size of potential damage.	
32	AK	The state seems like they give the EPA a hard time, but the state allocated a million dollars to do this same study a few years back - an independent scientific review. Nothing was done. In the Pebble Partnership, they talk about socio-economics and how we need this mine and we need jobs and we need this and that. But where are we going to be in 100 years when this boom and bust economy has wore itself out and exhausted itself out and our fisheries is to suffer.	
33	404C	I would like you guys to do a 404(c) process and have a sustainable economy in this area like we have had for thousands and thousands of years.	

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34	CUMU	Even if there weren't any accidents or catastrophic failures, common sense and now science tells us that development and operation of a mine this big would affect our fish populations and water quality. I am worried that even their exploratory drilling over the last few years has degraded water quality. We drink from a well at our house, and the kids enjoy clean safe water from the ground. I don't believe that Pebble can guarantee that acid, metal and other contaminants won't be released upstream from us over the life span of that mine. They might not even be able to detect that, which puts us all at risk.	
35	404C	...use the 404(c) action to protect our watershed and if nothing else, if I can leave one thing with you tonight, it's that you absolutely must do it, and you must do it now.	
36	WILD	As you can see, the commercial fishery in BB, it is economic support to my family. But more importantly, the salmon, they have provided countless meals over the years. The salmon have been at the center of our table for generations. The salmon have indirectly fed the mammals that are also part of our meals throughout the winter.	
37	404C	I understand that you have the power to prohibit mining waste from basically being dumped into the rearing habitat of our salmon under the clean water act section 404 and I would ask that you use that authority to prohibit mining waste from being deposited into the waterways of the Bristol Bay watershed.	
38	404C	The fishing community we need to protect this and 404(c) should be a must, it shouldn't be a maybe.	
39	SUBS	We make our living because the BB fishery. We also subsistence fish for salmon each year. Filling our freezer for the winter with salmon and our cupboards with canned and smoked salmon.	
40	ADD	One of my concerns has to do with the high seismic activity in this area and the creation of tailings ponds behind large earthen dams. The potential for leaching into our watersheds.	
41	404C	Thank you for your assessment and please help us protect our resource by using your authority to implement 404(c).	
42	WILD	There is more here involved than just the salmon fishery with all due respect. It's an entire ecosystem. Its birds, game, plants, its' the cultural dimensions of this that are at stake.	
43	404C	I urge you to use 404(c).	
44	CUMU	The watershed that they hope to impact, the Pebble people, will at the very minimum take away stream flow and then in the future it will be the leaching out that will be the killer. It is going to have an immediate impact to take water. It will destroy life.	
45	404C	We are supportive of the 404(c) process	
46	CULT	I feel like I need to speak on behalf of my ancestors that raised me and my parents that we have to respect this area as planned for the water and the salmon and the birds and the wildlife. Also, for myself now as a commercial fisherman and also for future generations. My kids, I hope that someday they can partake of this great fishery, one of the last great salmon fisheries in the world.	

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47	404C	take the appropriate action under 404(c).	
48	ECON	There have always been jobs for the people who want to work. Even when we were not actually employed, we have been able to live off of the salmon and the wildlife.	
49	ADD	I live between the Rogue and the Klamath Rivers. Those are nice rivers, but severely degraded, and they will never recover in spite of millions of dollars that have been thrown at recovery of the salmon that once resided there. They are always imperiled. We understand full well what damages are, what Pebble is proposing here is larger than anything that we know of.	
50	CULT	I hope that 100 years from now in June, when my, and all of our future generations show up here, that they are not living under a giant hammer of toxic ponds upriver from us.	
51	404C	I hope in my heart of hearts that you invoke your 404(c) authority and make sure that this mine does not take place or operate so that the salmon and the heart beat of this area can remain for many more generations.	
52	TEK	The elders have been telling me they haven't really had a chance to sit down and talk about it yet. I think that out of respect for the elders and the indigenous people here and the land holders, that just for that reason alone we should be able to go over some of this stuff so that we could make great decisions. They feel like they are being pressured.	
53	ECON	This fishery supports a variety of lifestyles. My particular one is direct marketing of BB wild salmon. The perception of my customers, primarily natural foods stores and restaurants, food coops and their customers perceive the fish that come out of this area to be absolutely the highest in the world for salmon. There is a growing demand for wild salmon. The reasons are obvious. Nutritional. If the perception, such as in the case of the Exxon Valdez, comes that the fish are tainted, then damage is done.	
54	CUMU	The other thing is that even if a small mine or a scaled down version of the Pebble Mine were allowed to go in the area. Other mines would go in the area and eventually you will have a much larger footprint.	
55	TEK	First, in the assessment you interview 53 elders and it looks like the data on subsistence indigenous culture and impact are region wide. Shouldn't your (inaudible). Who determined the list of 53 elders? How did your questions be determined? If you want these elders testimony included to help you make a decision, then why was there only one indigenous culture expert on your scientific peer review panel?	
56	ADD	This area sits in one of the most geologically active zones anywhere in North America. The impact of a sizeable earthquake is unknown, especially when you take into consideration what happened to Japan.	
57	ADD	My understanding is that this mine will require hundreds of millions of gallons of water to transport some 200 billion tons of crushed ore 87 miles to the coast. Further, the mine will require hundreds of millions of gallons of water from the water table for settling ponds for these mines. I just want to state that I'm not sure if we know what our water tables are here and what they will be 25 years from now.	

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58	ADD	Our climate is changing and the water table is changing also, so what we change our predictions on today may not be true 25 years from now.	
59	404C	I encourage you to use your preemptive veto to exercise your 404(c) authority. There is nothing in the permitting regime that would preclude development of this project.	
60	ADD	One aspect of this issue that gets overlooked is the temporal aspect of this issue. Mainly, how this issue will impact future generations.	
61	ADD	The subject of impacts of copper on the salmon are well documented, include, but are not limited to the seminal effects on salmon, liver damage, retarded growth among others.	
62	AK	Additionally, existing water quality standards for the state of Alaska are not sufficiently protective of salmon function. Therefore, the mine could meet water quality standards and still have a detrimental effect on the fishery.	
63	CUMU	I'm particularly worried about the 87 miles of spawning streams and gravels will disappear. This is unacceptable. In particular, I'm worried about Chinook and Coho that reside in the Koktuli River, which branches off the Mulchatna and Nushagak.	
64	WILD	I am also concerned about the caribou, something that is often disregarded when speaking about this issue.	
65	ECON	We are lucky that this resource feeds thousands of families and generates 400 or 500 million a year to the economy. This will result in more jobs according to your assessment that the mine would create if Pebble is development.	
66	CUMU	I am particularly concerned about the likelihood that the mine waste that is generated will become a severe and lasting source of acid mine drainage to the rivers and streams below the mine. I look at acid mine drainage as opening Pandora's Box, because there is no fix to acid mine drainage it becomes a matter of trying to manage it. The assessment estimates the waste rock pile alone could generate up to 2.8 million gallons of contaminated seepage every year and estimates the copper concentration in the seepage to be so high that the entire flow of Upper Talarik Creek could fail to meet water quality standards. It could contaminate the entire creek and potentially even Iliamna Lake could become toxic to fish.	
67	404C	I think there is a compelling case for a 404(c).	
68	404C	I hope that you will take the ability that you have and use it.	
69	AK	...the state has a huge role in this. It is concerning the coastal management has disappeared; there is very little state support for reservation and tour base.	